

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

PRASANNA SANKARANARAYANAN,)

Case No.: 2:24-cv-01745-RAJ

Petitioner,)

vs.)

PETITIONER'S EXHIBIT LIST

DHIVYA SASHIDHAR,)

Respondent.)

The Convention on the Civil Aspects of International Child Abduction, done at The Hague on October 25, 1980; International Child Abduction Remedies Act, 22 U.S.C. 9001 *et seq.*

Petitioner, Prasanna Sankaranarayanan ("Petitioner"), by and through his undersigned counsel, hereby submits the following Preliminary Exhibit List in connection with the trial schedule starting on January 6, 2025, in the above-captioned matter.

Petitioner reserves all rights to amend and/or supplement this disclosure for any reason, including without limitation, in response to Respondent's Exhibit list and Witness list, to respond to or rebut any argument or factual allegation made by Respondent or his witnesses, to impeach a witness, or to cure an inadvertent omission. Petitioner further reserves the right to amend these disclosures in light of Respondent's supplemental production.

Exhibit No.	Description	Objection	Date Admitted
1.	Email between Petitioner and Granero Moving re Furniture Moving, dated October 30, 2021.		
2.	Email between parties and Economic Development Board Re query on		

	Dependent's Pass, dated November 25, 2021.		
3.	Email between Respondent and Utkarsh Jain re virtual viewings of Singapore homes dated January 12, 2022		
4.	Email between parties and Child's Montessori re immunization records, dated February 28, 2022.		
5.	Email between Petitioner and Transparent International re furniture shipping, dated April 13, 2022.		
6.	Email from EVA Air re flights from Seattle to Singapore, dated April 21, 2022.		
7.	Email between parties and Health Science Authority re importing medication, dated May 2022.		
8.	Email from Two Men and a Moving Van re furniture moving, dated May 24, 2022.		
9.	Email from Universal Relocation re furniture moving, dated June 4, 2022.		
10.	Email between parties and Rheumatologist, dated June 7, 2022.		
11.	Email between Respondent and Treetops re accommodation in Singapore upon arrival, dated June 2022.		
12.	Email from Respondent re move to Singapore, dated July 4, 2022		
13.	Email from Universal Relocations re furniture moving, dated July 13, 2022.		
14.	Email between parties and Universal Relocations re cost of move to Singapore, dated May 11, 2022.		
15.	Respondent and Child's Dependent's Passes, Petitioner's Visit Pass		
16.	Email re Acknowledgement of SG Arrival Card & Health Declaration, dated July 15, 2022.		
17.	Child's Medical Forms and Immunization Record, dated October 6, 2022.		
18.	Tenancy Agreement for 15 Ardmore Park, dated July 27, 2022.		

19.	Tenancy Agreement for 4 Astrid Hill Singapore, dated June 11, 2024		
20.	2022-2023 Semester 1 Singapore American School Report Card.		
21.	2022-2023 Semester 2 Singapore American School Report Card.		
22.	2023-2024 Semester 1 Singapore American School Report Card.		
23.	Email between Petitioner and Singapore American School re admissions visit, dated February 17, 2022.		
24.	Email between parties and Singapore American School re event registration, dated February 22, 2022.		
25.	Email between parties and Singapore American School re application fee, dated February 24, 2022.		
26.	Email between parties and Singapore American School re orientation, dated July 18, 2022.		
27.	Email between parties and Singapore American School re teacher introduction, dated July 24, 2022.		
28.	Email between parties and Singapore American School re activities, dated July 27, 2022.		
29.	Emails between parties and Singapore American School re moved house, dated August 22, 2022.		
30.	Email from Eagle Activities to Petitioner re bus drop-off, dated August 27, 2022.		
31.	Email between parties and Singapore American School re Respondent's phone number change, dated December 2, 2022.		
32.	Email from Veracross re Re-enrolling Child in Singapore American School, dated February 16, 2023.		
33.	Email from Respondent to Singapore American School re Amar's birthday in school, dated February 21, 2023.		
34.	Email from Singapore American School to Parties re swim card, dated March 17, 2023.		

35.	Email between parties and Singapore American School re school bus change, dated August 14, 2023.		
36.	Event Registration Confirmation at Singapore American School, dated August 21, 2023.		
37.	Child's Offer Letter from United World College of South East Asia, dated March 20, 2024.		
38.	Invoice for United World College of South East Asia Term 1, dated March 20, 2024.		
39.	Child's Offer Package for United World College of South East Asia, dated March 30, 2024.		
40.	Enrollment in Chinese classes at United World College of South East Asia, dated March 30, 2024.		
41.	Invoice for United World College of South East Asia Term 2, dated June 14, 2024.		
42.	Payment Receipt for Extracurricular Activities, dated October 9, 2024		
43.	Email from United World College of South East Asia to parties re skateboarding, dated October 10, 2024.		
44.	Email from United World College of South East Asia to Petitioner re fees, dated November 6, 2024		
45.	Email from Respondent to United World College South East Asia re withdrawal, dated November 6, 2024.		
46.	Email from United World College South East Asia to the parties re withdrawal, dated November 7, 2024.	Hearsay	
47.	Email between parties re selling belongings before move, dated February 21, 2022.		
48.	Email between parties re Singapore American School jumpstart, dated April 13, 2022.		
49.	Email between parties, Madhu Sudan and Ram Prasha re furniture shipping, dated April 22, 2022.		

50.	Email between parties re Confirmation of Shangri-La, Singapore, dated May 24, 2022.		
51.	Email between parties re short term rental packages, dated May 31, 2022.		
52.	Email between parties re Swim school evaluations, dated August 12, 2022.		
53.	Email between parties re Eagles Activities & Athletics sign up, dated August 15, 2022.		
54.	Email between parties re after-school event, dated November 29, 2022.		
55.	Email between parties re bus to international fair, dated February 9, 2023.		
56.	Email between parties re book reading series, dated May 29, 2023.		
57.	Email between parties re cricket, dated August 20, 2023.		
58.	Email between parties re arrival in Washington, dated October 15, 2024.		
59.	Gleneagles Hospital in Singapore Receipt, dated March 14, 2023		
60.	Vision Screening Results for Child, dated April 4, 2023		
61.	Child's Birthday Invitations		
62.	WhatsApp Message inviting with Child to a playdate.		
63.	Collage of Photos of Child		
64.	Collage of Child and Petitioner 1		
65.	Collage of Child and Petitioner 2		
66.	Petitioner's Police Report re physical aggression in Singapore, dated August 31, 2024.		
67.	Respondent's Police Report for Domestic Violence in Singapore, dated August 31, 2024		
68.	Respondent's Affidavit filed in Singapore, dated September 9, 2024.		
69.	Respondent's Maintenance Application in Singapore Court, dated September 9, 2024.		

70.	Respondent's Personal Protection Application, dated September 26, 2024		
71.	Respondent's Affidavit filed in Singapore re service via email, dated October 2, 2024.		
72.	Respondent's Police Report for Sexual Assault in Singapore, dated October 2, 2024		
73.	Respondent's Police Report for Voyeurism in Singapore, dated October 3, 2024		
74.	Affidavit of Respondent in Washington Court re interim order for sole custody, dated October 7, 2024.		
75.	Email from East Asia Law to Respondent re Dependent's Pass and Divorce, October 11, 2024		
76.	Ex Parte Originating Summons in Singapore Court, dated October 14, 2024		
77.	Affidavit of Petitioner in Singapore Seeking order for custody, dated October 15, 2024.	Hearsay	
78.	Order of Court in Singapore Court not to remove Child, dated October 15, 2024.		
79.	Order of Court in Singapore not to remove Child, provide whereabouts by Oct18, dated October 17, 2024.		
80.	Affidavit of Respondent in Singapore Court re custody of Child, dated October 23, 2024.		
81.	Order of Court in Singapore not to remove Child and file stay of proceedings, dated October 24, 2024.		
82.	Letter from Drew Napier to Respondent re notes of evidence, dated October 29, 2024.	Hearsay	
83.	Document stating there is no outstanding warrant of arrest	Hearsay	
84.	Petitioner's Personal Protection Application in Singapore, dated October 30, 2024.		
85.	Summons for Custody of Child in Singapore Court, dated November 5, 2024.	Hearsay	

86.	Affidavit of Petitioner re interim video access in Singapore, dated November 5, 2024		
87.	Email between Respondent and Court re intent to withdraw orders in Singapore, dated November 6, 2024.		
88.	Affidavit of Petitioner re remaining enrolled at school in Singapore Court, dated November 6, 2024.		
89.	Email from Singapore Court to Drew Napier re request to withdraw applications, dated November 7, 2024.	Hearsay	
90.	Letter from August Law to Drew Napier re Respondents Redmond address, dated November 9, 2024.		
91.	Order of Court re leave to withdraw maintenance in Singapore, dated November 13, 2024.		
92.	Order of Court re leave granted to withdraw personal protection application in Singapore, dated November 13, 2024.		
93.	Letter from Singapore Police to Petitioner re no further investigation re rape, dated November 20, 2024.	Hearsay	
94.	Conditional Warning for Petitioner re voyeurism, dated November 21, 2024	Hearsay	
95.	Email from Singapore Police to Drew Napier re voyeurism warning, dated November 21, 2024.	Hearsay	
96.	Email from Singapore Police to Drew Napier re request for passport, dated November 22, 2024	Hearsay	
97.	Respondent Divorce Filing in Washington Court, dated September 6, 2024		
98.	Letter from Respondent's Washington Counsel to Petitioner, dated September 12, 2024.		
99.	Immediate Restraining Order and Hearing Notice filed in Washington Court, dated October 7, 2024		
100.	Respondent Return Reasons re return to Washington, dated October 10, 2024.		
101.	Washington Court Order re reconsideration and clarification, dated October 10, 2024		

102.	Emergency Ex Parte Motion for Temporary Family Law Order in Washington Court, dated October 14, 2024.		
103.	Respondent's Declaration in Washington Court, dated October 30, 2024		
104.	Motion re Jurisdiction and Anti Suit Injunction in Washington Court, dated October 30, 2024		
105.	Motion for Temporary Order in Washington Court, dated December 11, 2024.		
106.	Respondent's Amended Verified Answer and Affirmative Defenses		
107.	Dr. Day's Rebuttal Expert Report and CV	Cumulative if Favaro permitted to testify	
108.	Dr. Peter Favaro Expert Report and CV	See MIL, cumulative	
109.	Ms. Kee Lay Lian's Expert Report and CV		
110.	Dr. Poppleton's Child History Questionnaire, filled out by Respondent		
111.	Notes of Dr. Poppleton's Evaluation of Respondent		
112.	Notes of Dr. Poppleton's Evaluation of the Child		
113.	Recording of Dr. Favaro's Session with the Child (1)	See MIL	
114.	Recording of Dr. Favaro's Session with the Child (2)	See MIL	
115.	Recording of Dr. Favaro's Session with the Child (3)	See MIL	
116.	Recording of Dr. Favaro's Session with the Child (4)	See MIL	
117.	Transcript of Dr. Poppleton's Deposition (1)		
118.	Transcript of Dr. Poppleton's Deposition (2)		
119.	Transcript of Respondent's Deposition (1)		
120.	Transcript of Respondent's Deposition (2)		
121.	Transcript of Respondent's Mother Deposition		

122.	Anti Suit Order filed in India, dated December 19, 2024		
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Date: December 30, 2024

Respectfully submitted,
/s/Roni Ordell
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